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June 12, 2025

VIA ECF

The Honorable Analisa Torres
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *First Sentencing Adjournment Request*
United States v. Sandeep Grover et al., 24 Cr. 46 (AT)

Dear Judge Torres:

With the consent of Probation, Mr. Grover submits this letter to respectfully request an adjournment from his current sentencing date of July 7, 2025 to a date convenient for the Court and parties in December 2025 or January 2026. This is Mr. Grover's first sentencing adjournment request. The government opposes. Mr. Grover cannot truthfully and accurately complete his financial affidavit until after October 15, 2025 when his 2024 personal tax returns, currently on extension, and multiple C-corporation filings, are due.

Mr. Grover has an ownership interest in 105 companies. *See Exhibit A.* Of these 105 companies, Mr. Grover intends to scale down some in advance of his sentencing. The tax filing extensions for his companies are attached. *See Exhibit B.* Accordingly, we understand from Probation that they will need 14 days to synthesize the completed financial data that Mr. Grover will provide by October 17. From there, we will need at least 30 days to finalize our defense submission.

Currently, Mr. Grover is unable to provide Probation a complete or accurate representation of his financial status and cannot truthfully or accurately complete his financial affidavit. The government's conveyed its objection yesterday and said it was objecting because Mr. Grover is "proposing half a year...[t]his is not a reasonable amount of time given these are defendant's own companies." Yet, the government charged and Mr. Grover accepted responsibility for Major Fraud against the United States and Wire Fraud with regards to fraudulent PPP loan applications totaling nearly \$12 million. The last thing that Mr. Grover wants to do is commit any new crime against the United States. Mr. Grover thanks the Court for consideration of this request.

Respectfully Submitted,
Varghese & Associates, P.C.

/s
By: Vinoo P. Varghese, Esq.
Counsel for Mr. Sandeep Grover

cc: Government via ECF
Probation Officer Pamela Flemen